

EXHIBIT 6

MILBERG TADLER PHILLIPS GROSSMAN^{LLP}

NEW YORK

Elizabeth McKenna
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July 17, 2018

VIA EMAIL

Matthew Provance, Esq.
Mayer Brown LLP
71 South Wacker Drive
Chicago, IL 60606
MProvance@mayerbrown.com

Re: *In re Dealer Management Systems Antitrust Litig.*,
MDL No. 2817, Case No. 18-CV-864 (N.D. Ill.)

Dear Matt:

We write in response to some of the items in your July 16 letter in order to make our meet and confer this afternoon more productive.

Thank you for agreeing to withdraw your request for MDL Plaintiffs to return or destroy the following documents: CDK-0817841; CDK-0872317; CDK-0772377; CDK-0773364; CDK-0774104; CDK-0895627; CDK-0899836; CDK-0899845; CDK-0899896; CDK-0941168; CDK-1032800; CDK-1032802; CDK-1239941; CDK-1296654; CDK-1296657; CDK-1767126; CDK-1767128; CDK-1867175. Please let us know what you plan to redact in CDK-2046410. This also impacts CDK-2046413 and CDK-2418904 as they are part of the same email chain, so we request you review these as well. We agree to stipulate that CDK's production of these documents does not operate to waive privilege over any subject matter. Please clarify what you mean in regard to "approval of CDK's counsel of record in the FTC matter."

Dealership Class Plaintiffs July 12 Letter

We want to clarify the statement in our July 12 letter that "over 470 proposed clawback documents [were] not produced to Dealership Class Plaintiffs." Every single one of these documents produced by CDK to Dealership Class Plaintiffs in April 2018 bears a bates number and a placeholder, "Document Withdrawn for Privilege" – these documents were *not* produced in either their original state, or in redacted form, to Dealership Class Plaintiffs. See document list attached hereto as Exhibit C. Dealership Class Plaintiffs are clearly not able to contest CDK's clawback of documents they have never received. We again request an explanation as to why Dealership Class Plaintiffs did not receive the 474 documents listed in Exhibit C. Moreover, there are an additional 32 documents produced by CDK to Authenticom and Dealership Class Plaintiffs with the placeholder, "Document Withdrawn for Privilege." See Exhibit D attached to this letter. Please provide an explanation for this as well.

Matthew Provance, Esq.
July 17, 2018
Page 2

Thank you for the information regarding clawback of the documents in your Schedule A from the FTC. We have some follow-up questions:

1. When were the documents in Schedule A to your June 21, 2018 letter produced to the FTC?
2. You state the FTC was notified about the documents CDK wanted to claw back on April 13, 2018 and May 25, 2018. Why did you wait until June 21, 2018 to notify MDL Plaintiffs about clawing back the same documents?
3. When was the FTC notified about the document, CDK-2027384/CDK_CID_00465472, you state was “inadvertently omitted”? What is the status of this document?
4. Please confirm that you have not clawed back documents from the FTC on dates other than April 13, 2018 and May 25, 2018, and have not attempted to clawback documents other than those listed on Schedule A to your June 21, 2018 letter.
5. Please clarify your statement that, “We understand that the FTC has acknowledged receipt of CDK’s clawback letters and has confirmed that it has destroyed all documents in the April 13 letter.” Do you have written confirmation? If so, please provide. Please let us know which documents, by bates-number, you listed for clawback in your April 13 letter.
6. Please clarify whether there have been any written or verbal responses from the FTC as to why they have not destroyed (or sent back) documents listed in your May 25, 2018 letter. Please let us know which documents, by bates-number, you listed for clawback in your May 25 letter.
7. We again request the communications (*e.g.*, letters/emails) between CDK counsel and the FTC regarding clawback of the documents in question.
8. Please provide a copy of any confidentiality agreement between CDK and FTC concerning CDK’s document productions to the FTC.

Sincerely,

/s/ Elizabeth McKenna
Elizabeth McKenna

cc: CDK-MDL-Team@mayerbrown.com
Derek Ho, Michael Nemelka,
Joshua Hafenbrack, Benjamin Rudofsky
Peggy Wedgworth, John Hughes,
Michael Acciavatti

Exhibit C

<u>Bates</u> <u>Beg Authenticom</u>	<u>Bates</u> <u>End Authenticom</u>
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CDK-1156364	CDK-1156365
CDK-1157114	CDK-1157117
CDK-1157118	CDK-1157141
CDK-1157276	CDK-1157279
CDK-1157995	CDK-1157997
CDK-1164144	CDK-1164145
CDK-1164146	CDK-1164147
CDK-1164148	CDK-1164170
CDK-1164171	CDK-1164173
CDK-1164443	CDK-1164443
CDK-1164444	CDK-1164445
CDK-1164480	CDK-1164480
CDK-1164605	CDK-1164607
CDK-1164734	CDK-1164736
CDK-1164739	CDK-1164741
CDK-1165359	CDK-1165361
CDK-1171725	CDK-1171725
CDK-1183676	CDK-1183677
CDK-1186844	CDK-1186845
CDK-1186846	CDK-1186849
CDK-1186850	CDK-1186851
CDK-1186852	CDK-1186854
CDK-1189545	CDK-1189546
CDK-1192846	CDK-1192846
CDK-1195565	CDK-1195565
CDK-1199501	CDK-1199502
CDK-1207113	CDK-1207114

<u>Bates</u> <u>Beg. Authenticom</u>	<u>Bates</u> <u>End. Authenticom</u>
CDK-1207115	CDK-1207116
CDK-1207487	CDK-1207487
CDK-1788992	CDK-1788993
CDK-1789011	CDK-1789014
CDK-1880098	CDK-1880099
CDK-1880167	CDK-1880169
CDK-1880469	CDK-1880470
CDK-1881916	CDK-1881916
CDK-1881941	CDK-1881942

Exhibit D

<u>Bates</u> <u>Beg Authenticom</u>	<u>Bates</u> <u>End Authenticom</u>
CDK-2053049	CDK-2053049
CDK-2053050	CDK-2053054
CDK-2053081	CDK-2053081
CDK-2053082	CDK-2053082
CDK-2053091	CDK-2053092
CDK-2085868	CDK-2085869
CDK-2099382	CDK-2099383
CDK-2110849	CDK-2110850
CDK-2110858	CDK-2110859
CDK-2110869	CDK-2110870
CDK-2120490	CDK-2120492
CDK-2162695	CDK-2162695
CDK-2177494	CDK-2177494
CDK-2179568	CDK-2179568
CDK-2179569	CDK-2179569
CDK-2182111	CDK-2182112
CDK-2182113	CDK-2182115
CDK-2184832	CDK-2184833
CDK-2185599	CDK-2185600
CDK-2185601	CDK-2185602
CDK-2196713	CDK-2196716
CDK-2196717	CDK-2196720
CDK-2196721	CDK-2196746
CDK-2196766	CDK-2196766
CDK-2241802	CDK-2241802
CDK-2241803	CDK-2241803
CDK-2242117	CDK-2242119
CDK-2242210	CDK-2242210
CDK-2242355	CDK-2242357
CDK-2242873	CDK-2242875
CDK-2243234	CDK-2243235
CDK-2243450	CDK-2243452